

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Curt O. Hall,

Plaintiff,

v.

UBS Financial Services Inc. and Mary Lucy Reid,  
Individually,

Defendants.

C.A. No.: 6:19-CV-03316-TMC

**RESPONSE TO DEFENDANTS' MOTION REQUESTING THE SUBMISSION OF  
ADDITIONAL DOCUMENTS BE INCLUDED IN THE RECORD FROM THE  
CERTIFYING COURT TO THE SUPREME COURT**

WILL YOU PLEASE TAKE NOTICE that the plaintiff, Curt O. Hall ("Plaintiff"), by and through his undersigned counsel hereby submits his response to Defendants' Motion Requesting the Submission of Additional Documents be Included in the Record from the Certifying Court to the Supreme Court in the above captioned matter.

**INTRODUCTION**

In its Motion Requesting the Submission of Additional Documents be Included in the Record from the Certifying Court to the Supreme Court, the Defendants are seeking six (6) of the underlying pleadings to be added to the record related to the certified question. For the following reasons, Plaintiff objects to their inclusion.

**ARGUMENT**

The three (3) questions that the Court has certified to the South Carolina Supreme Court are intentionally general in nature, designed to answer questions of law and be applicable to

multiple fact scenarios. As such, the specific allegations and pleadings of the underlying case can only act to relegate the applicability of the answers this Court seeks. Further, there is nothing contained in the pleadings of the underlying case which would help the South Carolina Supreme Court answer the certified questions; much less be necessary for the South Carolina Supreme Court to do so. *See e.g. Rule 209(b), South Carolina Appellate Court Rules (A party shall not include any matter in his Designation which is not relevant to the appeal)*”).

### **CONCLUSION**

For the foregoing reasons, the Plaintiff respectfully objects to Defendants’ Motion Requesting the Submission of Additional Documents be Included in the Record from the Certifying Court to the Supreme Court

Respectfully submitted this 24<sup>th</sup> day of November 2020.

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